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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 ROBERT T. BROCKMAN,

20 Defendant.

Case No.: 3:20-cr-00371-WHA

STIPULATION TO EXCLUDE TIME
FROM NOVEMBER 17, 2020 THROUGH
DECEMBER 1, 2020 AND [PROPOSED] ORDER

21
22 It is hereby stipulated by and between counsel for the United States and counsel for the
23 defendant Robert T. Brockman, that time be excluded under the Speedy Trial Act from November 17,
24 2020 through December 1, 2020.

25 At the status conference held on November 17, 2020, the government and counsel for the
26 defendant agreed that this matter is complex, as defined in 18 U.S.C. § 3161(h)(7)(B)(ii), due to the
27 breadth and duration of the conduct alleged in the Indictment, and the government's representation that
28 discovery will be voluminous. The government and counsel for the defendant agreed that time be

1 excluded under the Speedy Trial Act because of the complexity of the case, because of pending motions,
 2 and so that defense counsel could continue to prepare, including by reviewing the discovery to be
 3 produced. For this reason and as further stated on the record at the status conference, the parties
 4 stipulate and agree to exclude time until December 1, 2020, and further stipulate and agree that the ends
 5 of justice served by excluding the time from November 17, 2020 through December 1, 2020 from
 6 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
 7 speedy trial. 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A), (h)(7)(B)(ii), (h)(7)(B)(iv).

8 The undersigned Assistant United States Attorney certifies that he has obtained approval from
 9 counsel for the defendant to file this stipulation and proposed order.

10
 11 IT IS SO STIPULATED.

12 DAVID L. ANDERSON
 13 United States Attorney

14 s/ Michael G. Pitman
 15 COREY J. SMITH
 16 Senior Litigation Counsel
 17 MICHAEL G. PITMAN
 18 Assistant United States Attorney

19 Attorneys for United States of America

20 s/ Neal J. Stephens
 21 NEAL J. STEPHENS
 22 Counsel for Defendant ROBERT T. BROCKMAN

23
 24 [PROPOSED] ORDER

25 Based upon the facts set forth in the stipulation of the parties and the representations made to the
 26 Court on November 17, 2020 and for good cause shown, the Court finds that time should be excluded
 27 from November 17, 2020 through December 1, 2020 under the Speedy Trial Act because of the
 28 complexity of the case, because of pending motions, and so that defense counsel could continue to

1 prepare, including by reviewing the discovery to be produced, taking into account the exercise of due
2 diligence. 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A), (h)(7)(B)(ii), (h)(7)(B)(iv). The Court further finds
3 that the ends of justice served by excluding the time from November 17, 2020 to December 1, 2020
4 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant
5 in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the
6 time from November 17, 2020 through December 1, 2020 shall be excluded from computation under the
7 Speedy Trial Act.

8
9 IT IS SO ORDERED.

10
11 DATED: _____

WILLIAM ALSUP
United States District Judge